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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. 24-cr-00508 JD
)	
Plaintiff,)	STIPULATION TO SET MATTER FOR
)	CHANGE OF PLEA AND EXCLUDE TIME
v.)	FROM OCTOBER 16, 2024, TO DECEMBER 9,
)	2024; [PROPOSED] ORDER
KARI RUSSO,)	
)	
Defendants.)	
)	
)	

Plaintiff UNITED STATES OF AMERICA and Defendant KARI RUSSO hereby stipulate as follows:

1. On October 4, 2024, the above-captioned matter was ordered related to *U.S. v. Kari Russo*, No. 23-cr-00336 JD.
2. A change of plea is currently set in *U.S. v. Kari Russo*, No. 23-cr-00336 JD, for December 9, 2024;
3. This matter should also be set for a change of plea on December 9, 2024, as it is anticipated both matters will be resolved with a single plea agreement.
4. With respect to the Speedy Trial Act, it is hereby stipulated by and between counsel for the United States and counsel for the defendant KARI RUSSO, that time be excluded under the

Speedy Trial Act from October 16, 2024, through December 9, 2024, for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice are served by excluding the time from October 16, 2024, through December 9, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for the Defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: October 16, 2024

/s/
WENDY M. GARBERS
Assistant United States Attorney

DATED: October 16, 2024

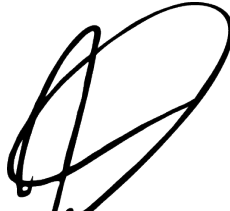
/s/
CANDIS MITCHELL
Counsel for Defendant KARI RUSSO

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, this matter is set for a change of plea on December 9, 2024, at 10:30 a.m. Additionally, the Court finds that failing to exclude the time from October 16, 2024, through December 9, 2024, would unreasonably deny the parties the reasonable time necessary for effective preparation, taking into account continuity of counsel and the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from October 16, 2024, through December 9, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from October 16, 2024, through December 9, 2024, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: October 16, 2024



JAMES DONATO
United States District Judge